

**Exhibit A**

**Proposed Seal Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
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**ORDER GRANTING EX PARTE APPLICATION FOR AN  
ORDER AUTHORIZING THE FILING OF REDACTED DOCUMENTS**

This matter having come before this Court on the ex parte application, dated July 3, 2013 (the "Application"),<sup>1</sup> filed by the Reorganized Debtors seeking entry of an order, pursuant to, among other things, section 107 of the Bankruptcy Code and Bankruptcy Rule 9018, authorizing the Reorganized Debtors to file redacted forms of the Motion to Compel and certain exhibits to the Declaration; and this Court having jurisdiction over the Application and the relief requested therein; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby

FOUND AND DETERMINED THAT:

- A. This Court has jurisdiction over the Application and the relief requested therein under 28 U.S.C. §§ 157 and 1334. Venue is proper under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b);
- B. The predicates for the relief requested herein are section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018;
- C. The relief requested in the Application is in the best interests of the Debtors, Reorganized Debtors, their estates, their creditors and other parties in interest; and, therefore, it is hereby

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall be ascribed the meanings provided in the Application.

ORDERED, DECREED AND ADJUDGED THAT:

1. The Application is GRANTED.
2. The Reorganized Debtors are authorized to file redacted versions of the Motion to Compel and Exhibits 3, 5 and 7 to the Declaration, and serve unredacted versions of those documents on the Court and New GM.
3. Any documents filed in response to this Application or the Motion to Compel that refer to or quote provisions of the Funding Agreement, or any projections thereunder, shall also be filed under seal (with redacted copies to be filed on the docket), with unredacted versions of those documents to be provided to the Court and the Reorganized Debtors (and New GM if applicable).
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.
5. Entry of this Order is without prejudice to any party in interest seeking relief from this Order upon written application on notice to the Reorganized Debtors, New GM and such other parties entitled to receive notice under the Case Management Orders.

Dated: White Plains, New York  
July \_\_, 2013

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE